



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

June 19, 2020

VIA ECF

The Honorable Mary Kay Vyskocil
United States District Court
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, New York 10007

Re: *United States v. Navarro et al.*, 20 Cr. 160 (MKV)

Dear Judge Vyskocil:

The Government writes pursuant to the Court's Emergency Individual Rules and Practices In Light of COVID-19 to indicate the parties' views on whether the Court may conduct the upcoming June 30, 2020 status conference in the above-captioned matter by phone. In light of the COVID-19 pandemic and given the number of parties in this action, including those who reside outside New York State, the Government respectfully requests that the Court hold the next status conference by telephone. A teleconference may be scheduled in lieu of in-person appearances consistent with the U.S. Constitution and the Federal Rules of Criminal Procedure. Although not every defendant's counsel has responded to the Government's June 10 and June 15, 2020 emails requesting any objections, no defendants has objected to proceeding by teleconference. Further, the following defendants have indicated, through counsel, that they waive their participation in the teleconference altogether: Jordan Fishman, Rebecca Linke, Gregory Skelton, Erica Garcia, Nicholas Surick, Jorge Navarro, Michael Tannuzzo, Christopher Oakes, Marcos Zulueta, and Michael Kegley, Jr. Wherefore, the Government respectfully requests that the status conference currently scheduled for June 30, 2020 at 11:00 a.m. be held by telephone.

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney

by: /s/ Sarah Mortazavi
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